NIH POLICY MANUAL

54514 - ROLE OF STAFF AT PEER REVIEW ADVISORY COMMITTEE MEETINGS & EXCHANGE OF INFORMATION AMONG REVIEW, PROGRAM & GRANTS MANAGEMENT STAFFS

Issuing Office: OER 496-1964

Release Date: 10/2/95

- 1. Explanation of Material Transmitted: This chapter contains revised and updated policy for the roles of review, program, and grants management staffs at initial review meetings and National Advisory Council meetings. In addition, it describes the exchange of information between NIH staff associated with these meetings and the review process.
- 2. Material Superseded: NIH Manual Chapter 4514 dated 06/06/91
- 3. Filing Instructions:

Remove: NIH Manual 4514 dated 06/06/91

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A. Purpose:

This chapter describes the appropriate roles for review, program, and grants management staff at Initial Scientific and Technical Peer Review Panel and National Advisory Council/Board (hereinafter referred to as review panel and Council, respectively) meetings. In addition, it describes what information about grant and cooperative agreement applications (hereinafter both referred to as grant applications) is to be exchanged between review panels and program/grants management offices.

B. Applicability:

This policy applies to all grant application reviews, whether conducted or managed by the Division of Research Grants (DRG) or other NIH components.

C. References:

- 1. Federal Advisory Committee Act, Public Law 92-463.
- 2. Privacy Act of 1974, 5 U.S.C. 552a (P.L. 93-570), as amended by the Computer Matching and Privacy Protection Act of 1988 (P.L. 100-503).
- 3. <u>NIH Manual Chapter 1805</u>, Use of Advisors in Program and Project Review and Management.
- 4. NIH Manual Chapter 2300-735-2, Procedures for Avoiding Conflict of Interest for Public Advisory Committee Members (pending release).
- 5. <u>NIH Manual Chapter 4201</u>, Release of Information on Research and Training Grants, Awards, and Cooperative Agreements.
- 6. <u>NIH Manual Chapter 4510</u>, Referral and Initial Review of NIH Grant and Cooperative Agreement Applications.
- 7. <u>NIH Manual Chapter 4511</u>, Project Site Visits Involving Review of Grant and Cooperative Agreement Applications.
- 8. NIH Manual Chapter 4512, Summary Statements.

- 9. <u>NIH Manual Chapter 4513</u>, Management and Procedures of National Advisory Councils and Boards in Their Review of Extramural Activities.
- 10. NIH Manual Chapter 4518, Peer Review Rebuttals and Appeals.
- 11. <u>NIH Manual Chapter 4815</u>, Implementation of Cooperative Agreements Initiation, Review, Award and Administration.
- 12. <u>NIH Manual Chapter 5808</u>, Establishment and Documentation of Files and Other Records, Including Monitoring Actions, for NIH Grant Programs.

D. Policy:

NIH policy requires separation of extramural staff functions to ensure the fairness and objectivity of the review process. NIH Staff, consisting of the Scientific Review Administrator (SRA), the Grants Technical Assistant (GTA), the Program Administrator, and the Grants Management Specialist, have important and complementary roles and responsibilities in the grants process and in ensuring the proper stewardship of Federal grants. Each member of the Federal team is responsible for work that is essential to making well reasoned funding decisions. During the application review process and throughout the life of the grant, NIH staff interaction is defined by the roles and responsibilities established for those serving in these positions. These roles reflect a balance of cooperation and independent responsibilities, but it is a balance which changes at various stages of the grant process. This balance is intended to ensure fair and objective review, and as a consequence, maximize the quality of the award decisions.

Cooperative, collegial relationships between program, review and grants management staff representatives are essential at each stage of the review and award process. This commences with coordinating activities well before the initial review meeting, addressing such issues as potential review consultants, review logistics and administrative concerns. The maintenance of these cooperative working relationships through the entire review and award process is a major factor in enhancing the quality of the funding decisions.

Following receipt and assignment of an application to a review panel and until the conclusion of the initial review meeting, all communications regarding the application are the responsibility of the SRA. Thereafter, program and grants management staff are responsible for all oral and written communications with the applicant.

NIH staff may provide factual information related to applications under review, but must avoid evaluative statements** In some instances, review or program staff's conflict of interest with an application may be of such significance that s/he must not participate in any phase of the review process. When the SRA and program administrator cannot agree on the validity of a perceived staff conflict of interest, the Institute/Center (IC) representative to the Extramural Program Management Committee (EPMC) will be responsible for resolution of the problem.

** However, when NIH staff serve as reviewers, they have all of the rights, privileges, and responsibilities of other reviewers.

All significant documents identified as part of the official grant file system, (as described in NIH Manual Chapter 5808) that are used in the initial review or the management of awarded grants, whether initiated or received by review panel, program, or grants management staff, shall be sent to the official file promptly after they are received and shall thereby be available to NIH staff as needed.

Proceedings and materials of the review process are confidential.

Communications between NIH staff and the applicant that violate the confidentiality of the review process are prohibited. (See also <u>Manual Chapter 4510</u>, Section I, Confidentiality.)

E. Implementation:

E.1. IRG Review Panel Meetings

Refer to the APPENDIX for a detailed outline of the roles of all participants in the initial review process.

E.1.a. Scientific Review Administrator - To meet requirements of the Federal Advisory Committee Act, the SRA is designated as the Designated Federal Official (DFO) with legal responsibility for managing the review panel meeting. This includes determinations of conflicts of interest. The SRA is responsible for all arrangements for review panel meetings and for making every effort to see that the IRG review panel arrives at scientifically valid

recommendations, without attempting to influence those recommendations. The SRA supplies factual information requested by the review panel, and provides guidance on and implements NIH policies and procedures.

E.1.b. Program Staff - Program staff attend review panel meetings as observers where applications for which they are responsible are being reviewed. When requested by the SRA or by the review panel members through the SRA, program staff also serve as a resource to explain or amplify grants policy, clarify administrative matters that may have a bearing on the application under discussion, and provide information about pertinent program policies or practices.

Program staff attend review panel meetings also to gather background information regarding the review of applications, and to benefit Council discussions and subsequent management.

E.1.c. Grants Management Staff - Grants management staff monitor the review process to certify that it was conducted in accordance with applicable policies requiring an objective review of grant applications. Grants management staff may be called upon to provide assistance in budgetary matters and to interpret or clarify budget rules and policy guidelines.

E.1.d. Other Institute or Federal Staff - Only those Federal officials who have a need-to-know or pertinent related responsibilities are permitted to attend closed review meetings. All individuals in the "other institute or federal staff" category wishing to be present at review panel meetings must have advance approval from the responsible SRA.

E.2. National Advisory Council Meetings - All staff roles relative to Council are built on the premise that Council is an informed, but independent source of advice to Institutes and Centers. Any compromise of this independence will lessen the benefit gained from Council recommendations. The Council Executive Secretary is responsible for Council procedures. Staff should refer to the Executive Secretary for IC-specific procedures, such as those for gaining recognition to provide additional information to Council.

E.2.a. Review Panel SRA - Review panel SRAs attend appropriate Council meetings, and provide promptly any additional information on rebuttals and staff actions required for presentation to the Council. The SRA shall be prepared to clarify the information or recommendations in summary statements.

E.2.b. Program Staff - Program staff serve as a scientific resource to the Council with respect to both individual applications and to particular areas of scientific research, or to provide information about programs or practices. Program staff attend Council meetings where applications for which they are responsible will be discussed, and may bring to Council specific recommendations for actions relating to individual applications which require Council concurrence or for which staff seeks Council advice. In advance of the Council meetings, program staff alert the Council Executive Secretary and the review panel SRA about such planned actions as well as problems regarding any application.

When requested by a Council member or senior awarding component officials, program staff serve as a resource to Council. Some situations may require program staff to seek recognition from the Council chair to correct misinformation or provide additional information.

E.2.c. Grants Management Staff - As in their initial review role, grants management staff monitor the second-level review process to certify that it was conducted in accordance with applicable policies requiring an objective review of grant applications. When requested by a Council member or a senior awarding component official, grants management staff serve as a resource to Council to explain or amplify grants policy or to clarify administrative matters that may have a bearing on the application.

Some situations may require grants management staff to seek recognition from the Council chair to correct misinformation or provide additional information.

E.2.d. Other Institute or Federal Staff - Only those Federal officials who have a need-to-know or pertinent related responsibilities are permitted to attend closed Council meetings. All individuals in the "other institute or federal staff" category wishing to be present at Council meetings must have advance approval from the Council Executive Secretary.

E.3. Project Site Visits for Peer Review - Initial review groups may conduct Project Site Visits (PSVs) as an element of the scientific peer review process for grant and cooperative agreement applications. The roles of staff and availability of information pertaining to PSVs are discussed in NIH Manual Chapter 4511.

E.4. Exchange of Information Between Review Staff and Program and Grants Management Staff

E.4.a. Communications - Effective and appropriate exchange of information among review, program, and grants management staff is essential to the successful review of applications and the management of NIH grants.

- (1) Correspondence Written correspondence from applicants which augments, amends, or alters the application in any way must be exchanged among appropriate staff and sent promptly to the official file. Communications that challenge/ dispute/protest the assignment and/or review processes are handled similarly. Copies of correspondence from the SRA to the Principal Investigator and/or reviewers confirming review meeting or site visit arrangements are provided to program and grants management staff. Other correspondence between the SRA and review panel members, or between program or grants management staff and Council members, is exchanged only as necessary.
- (2) Telephone Telephone conversations between NIH program or grants management staff and applicants concerning any aspects of the review that are expected to require Council action should be shared with the review panel SRA before the Council meeting and be documented in the official file.

E.4.b. SRA Responsibilities - Scientific Review Administrator responsibilities include making available to designated NIH staff copies of the following items and identifying them as "Privileged Communications":

- agenda, including order of review, well in advance of the review meeting;
- summary statements and summary reports from expedited reviews;
- site visit reports, if available: questions or concerns about release of information under the Privacy Act should be directed to the ICD Privacy Act Coordinator or the NIH Privacy Act Officer;

- incoming correspondence to the SRA that affects the application. Original correspondence is forwarded immediately to the official file; and
- outgoing correspondence from the SRA confirming site visit and/or review meeting arrangements.

E.4.c. Responsibilities of Other Staff - IC staff send to the Deputy Chief for Referral, DRG, and the SRA, the report of Council deferrals. Grants management staff make available items from the official file, as needed.

E.5. Communication Between Councils and Review Panels - Written statements documenting rationales for Council non-concurrences with review panel recommendations are provided to the Deputy Chief for Referral, DRG, and review panel SRAs promptly. (See Manual Chapter 4513, Section E.5a., for details). All communications between the Council and review panels regarding applications assigned to that Council are to be coordinated through the Executive Secretary to the council.

E.6. Confidentiality of Information Related to the Review Process - Attributing individual written or oral evaluative comments or ratings to particular reviewers' is prohibited, even when verbatim comments appear in the summary statement. Review panel and Council recommendations are reported without attribution.

F. Records Retention and Disposal

Records are retained and disposed of under the authority of the NIH Records Control Schedule contained in NIH Manual Chapter 1743, Appendix 1 -- Keeping and Destroying Records (HHS Records Management Manual, Appendix B-361), item 1100-H-2. Refer to the NIH Manual Chapter for specific disposition instructions.

NIH policy requires separation of extramural staff functions to ensure the fairness and objectivity of the review process. This document outlines the roles of staff at each phase of the review process: pre-application receipt; preparation for review panel meeting(receipt to review panel meeting); review panel meeting; and, post-review panel meeting. The changing roles at the various points in the process are highlighted. In addition, the roles of the applicant principal investigators as well as the review consultants are included at each phase.

NIH policy regarding peer review procedures continues to evolve, and such changes in process necessarily impinge upon the roles of all participants. Recognizing this, the present document includes only the core components of the review process and does not attempt to encompass all aspects of the participants' roles. Instead the document presents a superimposition of the complementary roles of the participants at the critical points in the initial review process.

I. Pre-Application Receipt

Scientific Review Administrator (SRA)

For particularly complex or new grant mechanisms, the SRA and/or other review staff may be asked to participate with program and grants management staff in direct preapplication consultations with prospective applicants to provide objective information on application format, review procedures and schedule, special instructions for submission, etc.

The SRA can also contribute to aspects of the development of special grant solicitations (e.g., Program Announcements and Requests for Applications) such as scheduling of the review and development of review criteria and therefore may be consulted early in their development by program staff.

Grants Technical Assistant (GTA)

The GTA provides logistical support for review staff participation in pre-application activities.

Program Administrator

Program staff are responsible for advising potential applicants about funding opportunities to accomplish the mission of the NIH. Among the formal tools used to stimulate and inform potential applicants are Program Announcements, Requests for Applications, supplemental instructions, and guidelines for specific award mechanisms. These are announced in the NIH Guide for Grants and Contracts.

To improve the responsiveness and quality of applications early in the process, Program Administrators should routinely provide potential applicants with the most current guidelines and policy statements relevant to a particular award mechanism.

For program project grant applications or other large, complex awards that may require special review arrangements, program staff can facilitate planning for the review process by informing referral and review staff of letters of intent or verbal communications from potential applicants indicating a future submission of an application. Alerting review staff about possible submission of amended applications or providing information useful in planning future review assignments is helpful. Program staff consult with referral office staff via the IC Referral Liaison, regarding receipt dates.

Grants Management Specialist

The Grants Management Specialist is the IC contact for fiscal and other administrative matters. Grants management staff are in a position to provide valuable input with respect to Public Health Service policies and procedures. They should be consulted by program staff early in the development of program initiatives. Grants management staff may be asked to respond directly to questions from potential applicants and may participate in direct consultations with applicants in pre-application meetings.

Review Consultants (Reviewers)

The reviewers do not participate in the pre-application receipt phase. An exception can occur where potential reviewers are contacted prior to receipt of applications due to an expedited review.

Applicant Principal Investigators (Applicants)

It is the responsibility of applicants to follow the latest guidelines and instructions in preparing their applications. Applicants must not contact reviewers regarding their applications since discussion of scientific content of an application or an attempt to influence review outcome will constitute a conflict of interest in the review.

Applicants may provide names of experts who, for personal or professional reasons, they consider unable to render an objective opinion on the content of the application. The specific basis for such recommendations should be provided to the SRA, who will determine whether or not a conflict of interest exists.

II. Preparation for Review Panel Meeting

Scientific Review Administrator (SRA)

Once an application is assigned to an initial review group (review panel), it becomes the primary responsibility of the SRA. The SRA manages and coordinates all aspects of the pre-review process as the Designated Federal Official (DFO) in charge of the initial review. This includes reviewing applications upon receipt for completeness and conformity to administrative requirements; identifying the need for and securing additional information; ensuring that appropriate expertise is available for the review; securing appropriate additional reviewers if needed; assigning appropriate reviewers; distributing all necessary documents to the reviewers; and determining if site visits or applicant interviews are needed. The SRA has responsibility for implementation of review policy and procedures and is the contact for all communication with the applicant up to the conclusion of the initial review meeting. The SRA also is charged with coordinating the exchange of information with program and grants management staff throughout the pre-review process. Any direct communication by applicants with other NIH staff concerning the review during the pre-review phase, should be redirected to the SRA.

When an application is assigned for review, the SRA may solicit and may receive from program staff suggestions concerning reviewers, pertinent background information, and information regarding any administrative issues that may be relevant to the review.

Review dates are selected to accommodate the schedule of reviewers. To the extent practical, SRAs also consider review dates that are compatible with the schedules of other NIH staff by first checking with them before scheduling the meeting. The SRA is responsible for determining the deadline for receipt of additional materials from applicants. This date is usually based on the time needed to get the materials to the reviewers and the time required by the reviewers to read them. In the event any materials are received late, the SRA evaluates their appropriateness and determines their acceptability. This is particularly critical in the case of applications submitted in response to an RFA since a special receipt date for applications is announced in the RFA; acceptance of additional material after this date must be handled in a fair and equitable manner. SRAs provide program staff and grants management staff with timely notices and other materials relating to review meetings and project site visits. Examples of such materials are proposed meeting dates, agenda, and order of review.

Grants Technical Assistant (GTA)

The GTA plays a key role during the pre-review phase. This individual is responsible for logging in materials for each application as they are received; assuring that complete and usable materials are available to review panel reviewers and to NIH staff offices in a timely way; making sure that all required assurances and certifications are received before the review takes place; making arrangements for site visits and review meetings; sending relevant correspondence and other documentation to the official file for each application; and checking the accuracy of the data set for each application under review.

Program Administrator

The role of program staff during the pre-review phase is largely to serve as a resource. Program staff provide to the SRA background information which may be relevant to the review. The SRA determines whether or not such information should enter into the review.

Program staff identify to the SRA any applications deemed either non-responsive or ineligible for support. This applies primarily to applications submitted in response to RFAs. It is best when program staff notify review staff about applications of this kind as early as possible in the process, since such applications should not be reviewed and must be returned to the Division of Research Grants either for reassignment or for return to the applicant.

Program staff provide to the SRA dates to be considered in the scheduling of initial review meetings.

In the event that multiple program staff wish to attend a review meeting, they coordinate their plans with the SRA to ensure that the meeting site has sufficient space to accommodate staff, that there will not be an inordinate number of observers, and that proper introductions may be made.

Should program staff wish to provide information to reviewers about such matters as the purpose of an RFA or the funding history of an application, to the extent possible they should arrange this with the SRA prior to the meeting. Comments about the funding history of an individual application are limited to factual information, avoiding any evaluative comments about the investigators or the progress made.

Grants Management Specialist

Grants Management staff serve primarily as a resource during the pre-review phase. In this role, they may provide information related to allowability of requested costs, PHS policy compliance, or overlap issues. For some solicited or specialized grant mechanisms particular restrictions may apply and, if necessary, information regarding these should be discussed with the SRA. Grants management staff should clear information they wish to provide to reviewers with the SRA before it becomes a part of the review process, and coordinate with the SRA plans for attendance at site visits or review meetings.

Reviewers

Members of review panels must report to the SRA any communication with applicants or their surrogates that would result in a conflict of interest in the subsequent review, e.g., consultation on details of the research plan. The review consultant should advise the SRA as soon as possible so that any potential conflicts of interest can be identified prior to the review.

Applicants

In general, the applicant does not participate in the pre-review phase unless he/she wishes to submit additional information for consideration by the reviewers, or the SRA requests additional information for the review.

As discussed in the Pre-Application Receipt Phase, applicants may not suggest particular reviewers, but may identify individuals who they are concerned may not give a fair and informed review. Such concerns are directed to the SRA.

Since the SRA is responsible for determining the deadline for receipt of additional materials and for determining the appropriateness of those materials, all additional materials from the applicant are to be submitted directly to the SRA. Distribution of any additional information is at the discretion of the SRA.

All communication regarding the review from the time of submission through the completion of the initial review meeting must be through the SRA.

III. Review Panel Meeting

General Principles

Reviewers are not to lobby for their research area or discuss their own research grants or grant applications with any NIH staff representatives at any time during the course of a review meeting.

Reviewers may not discuss the review, or content of any application outside of the meeting itself. NIH staff (including program, review, and grants management) may only discuss these matters as part of their official responsibilities. Refer to Manual Chapter 4510, section D (Policy) for the general statement on confidentiality. NIH staff (including program, review and grants management) may not provide evaluative input to reviewers nor may they participate in evaluative aspects of the review. An exception to this is when NIH staff serve as reviewers.

Scientific Review Administrator (SRA)

The SRA serves as the DFO with legal responsibility for managing the review panel meeting and receiving the recommendations on behalf of the NIH. The SRA must assure the fairness and consistency of the review process and assure that the review is conducted according to relevant laws, policy, regulations, and established NIH procedures. The SRA is responsible for controlling the environment and the context within which a review occurs. This includes ensuring that only information relevant and essential to a determination of scientific merit is utilized by the reviewers. The SRA provides guidance and direction throughout the meeting to assure that discussion and deliberations are limited to relevant matters. The SRA is responsible for assuring adherence to regulations regarding conflict of interest. In general, the SRA is responsible for the management of all aspects of the review process.

Grants Technical Assistant (GTA)

The role of the GTA is to provide logistical and technical support to the SRA and to the review committee in assuring that all required information is available and that all required paperwork is completed. The GTA is responsible also for tracking and documenting budget recommendations, comments/concerns regarding human subjects, animal welfare, and inclusion of women and minorities, and for collecting the reviewers' written comments.

Program Administrator

Program staff observe the conduct of the review for the purpose of understanding and interpreting the summary statement, and to benefit Council discussions and subsequent management.

Program representatives may provide descriptive background information on the funding history of an application, but should coordinate this with the SRA. Staff may not make evaluative statements about the application or the prior productivity of the project or investigators. The SRA (or Chair, with the approval of the SRA) may call upon the program representative during the course of the meeting to request non-evaluative information or clarification as needed. If the program representative perceives the need to provide input during the review, he/she approaches the SRA with the concern before addressing the reviewers directly.

Grants Management Specialist

The role of Grants Management staff is to monitor the review process and assure that budgetary issues are dealt with according to NIH policy guidelines. They may be called upon by the SRA (or Chair, with the approval of the SRA) to provide interpretation and/or clarification in this capacity, with the concurrence of the SRA. Grants Management staff may respond directly to issues raised by reviewers.

Reviewers

The role of reviewers is to make recommendations to the NIH on the scientific merit of applications assigned to the initial review group for evaluation.

This determination is to be made using the established criteria and without regard for issues of program relevance, need, or the investigator's current funding status. However, in the case of an RFA, program priorities are explicit and may be expressed in published review criteria. Reviewers should presume that all applications submitted in response to an RFA and which are brought forward to the review panel have been judged to be responsive to the RFA by Program Staff. Review committee members may not directly request input from program or grants management staff; such requests must be directed to the SRA, who will determine their appropriateness and ask for the needed information.

The role of the review panel chairperson is to preside at the meeting, following the agenda prepared by the SRA. The chairperson is responsible for the quality of scientific discussion that supports the review panel's recommendations. This includes assuring that the contributions, views, and inquiries of all reviewers are weighed and that the recommendations of the review panel are well considered and clearly conveyed to the SRA. The chairperson works closely with the SRA to discuss and resolve issues affecting the review panel, its members, or the conduct of the meeting. The Chairperson is not responsible for providing guidance on matters of review policy.

Applicants

Applicants in general have no role at the review panel meeting. In those cases where the applicant is contacted to provide additional information (through a project site visit, or through an applicant interview in person or by telephone), the SRA is responsible for the clarification of the applicant's role.

IV. Post-Review Panel Meeting

General Principles

Following the review meeting, the SRA prepares in a timely manner, a summary statement for each application reviewed, as well as minutes of the meeting. Priority scores and percentiles are mailed to the applicants by the Division of Research Grants as soon as possible. Following the review panel meetings, applicants should consider their program representative to be the primary contact. Any inquiries to reviewers from the applicant should be redirected to the SRA by the reviewer. Any inquiries to the SRA by the applicant should be re-directed to the program administrator.

Summary statements are sent in a timely manner to applicants by NIH staff. Following receipt of the summary statement, the Program Administrator makes preparations for second level review (National Advisory Council or Board) and possible funding. The Program Administrator, in cooperation with the SRA, responds to any rebuttal letters from the applicant. Reviewers may be asked by the SRA for further advice if questions arise as the summary statement is prepared and reviewed.

To reduce the chances that incorrect information is given to an applicant, no one should discuss the content of the review with the applicant until the summary statement is available. When it is available, the applicant should contact the Program Administrator for any additional clarification.

No one should ever attribute individual comments made during a review to a particular reviewer, or attribute any part of a summary statement to a particular reviewer.

Scientific Review Administrator (SRA)

After the review panel meeting, the SRA prepares and releases summary statements in a timely manner for each application reviewed. The SRA may need to respond to suggested corrections or questions by the Program Administrator before the summary statement is released to the applicant. If there is a rebuttal, the SRA contributes comments to the program director for the preparation of the response.

Grants Technical Assistant (GTA)

The GTA assists in the preparation of summary statements and minutes. In addition, this individual is responsible for entering the priority score and budget recommendations into IMPAC as well as making administrative code changes. The GTA may contact, the SRA for clarification of budget recommendations in the summary statement.

Program Administrator

At the conclusion of the review panel meeting, the Program Administrator becomes the primary contact for the applicant. Before the summary statement is released to the applicant, the Program Administrator usually has an opportunity to review the summary statement and discuss any questions with SRA. After the summary statement is released, the Program Administrator responds to any rebuttal letters and advises applicants concerning possible funding or submission of an amended application.

Grants Management Specialist

After the initial review meeting for larger complex mechanisms (P01, P30, etc.), the grants management specialist may prepare the budgetary calculations for use by the SRA in preparing the summary statement. The budgetary justifications for the summary statements are based on the comments of the review panel. The SRA, program, and grants management staff may meet, after the initial review, to clarify and share information and to discuss the outcome of the review panel meeting. This interaction between the SRA, program staff and grants management staff assures that the interested parties are informed quickly about the meeting results.

Reviewers

The role of the reviewers is concluded at the end of the review panel meeting. Follow-up questions may be asked on occasion, but only by or through the SRA at this point. Their primary responsibility is to maintain the confidentiality of the review process. At the review panel meeting, members of chartered review committees have access to the summary statements for those applications reviewed by their group at the previous meeting. This information, along with voting behavior data, provides reviewers with important feedback. Reviewers may not discuss the review with peers or applicants.

Applicants

See "General Principles".